

LAW OFFICES OF JOSEPH P.H. AHUNA, JR.

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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

FAITH KEPA'A;

Plaintiff,

v.

WALMART, INC. and DOE DEFENDANTS
1-100,

Defendants.

Civil No. CV 20-00295 JAO-KJM

PLAINTIFF'S RULE 26(f) WRITTEN
REPORT OF THE CONFERENCE OF THE
PARTIES; CERTIFICATE OF SERVICE

PLAINTIFF'S RULE 26(f) WRITTEN REPORT
OF THE CONFERENCE OF THE PARTIES

Plaintiff, by and through counsel, hereby submit her Rule 26(f) Written Report of the Conference of the Parties. Pursuant to Rule 26(f) of the Federal Rules of Civil Procedure, counsel for Plaintiffs and Defendant ADEPT PROCESS SERVICES, INC. participated in an conference on July 13, 2020, wherein the following discovery plan was agreed upon.

Initial Disclosures: The parties will complete the initial disclosures required by Rule 26(a)(1) within thirty (30) days of the completion of the Rule 16 Scheduling Conference.

1. Discovery:

- a. Discovery will be needed on the following subjects:
 - i. Medical records and expert reports.

- ii. Investigation reports, statements, recordings related to the incident.
 - iii. Surveillance footage.
 - iv. Other subjects as described in the Complaint and discovered/disclosed in the normal course of discovery.
- b. Timing of discovery:
- i. Commencement of discovering: Discovery will commence following the exchange of initial disclosures.
 - ii. Completion of discovery: Discovery will be completed within the deadlines set by this Court pursuant to the Federal Rules of Civil Procedure.
2. Disclosure and discovery of electronically stored information: Disclosure or discovery of electronically stored information should be handled pursuant to Federal Rules of Civil Procedure, Rule 26.
3. Claims of privilege or protection:
- a. Attorney-client communications.
 - b. Attorney work product.
4. Other Items:
- a. The parties have discussed alternative dispute resolution options and are prepared to consider this matter further and discuss options at the Scheduling Conference.
 - b. Suggested trial date and estimated of trial length.
 - i. Plaintiff would like to have a trial date in November 2021 or thereafter. Plaintiff estimates length of trial would be 3-5 days.

DATED: Honolulu, Hawaii, July 14, 2020.

/s/ David K. Ahuna
JOSEPH P.H. AHUNA, JR.
DAVID K. AHUNA
Attorneys for Plaintiff

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CERTIFICATE OF SERVICE

CERTIFICATE OF SERVICE

I hereby certify that on this day a copy of the foregoing document was duly served electronically via CM/ECF upon filing on the following individuals:

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Attorneys for Defendant WALMART, INC.

DATED: Honolulu, Hawaii, July 14, 2020.

/s/ David K. Ahuna
JOSEPH P.H. AHUNA, JR.
DAVID K. AHUNA

Attorneys for Plaintiffs